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The Honorable William K. Reilly
Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Reilly:

With this letter, we are enclosing the Public Health Advisory for radiation exposure, potential exposure to heavy metals, and physical hazards associated with the Navajo-Brown Vandever and Navajo-Desiderio Uranium Mining Areas near Bluewater, New Mexico.

The Agency for Toxic Substances and Disease Registry (ATSDR) has evaluated the available environmental information for the inoperative Navajo-Brown Vandever and Navajo-Desiderio Uranium Mining Areas. As a result of this evaluation, we consider the sites a potentially serious threat to human health because of the presence of uranium mine wastes, associated radon emission, and the potential presence of heavy metals in residential areas. These areas also contain many readily accessible mine shafts and open-pit mining areas. In accordance with Section 104(i)(6)(H) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), ATSDR is recommending that you evaluate the sites for inclusion on the National Priorities List.

In the Public Health Advisory, ATSDR recommends the following actions:

1. The Environmental Protection Agency (EPA) should initiate data collection to characterize the contamination and its extent.
2. If the data being collected indicate that residents face an imminent radiation health hazard, immediate action should be taken to mitigate the hazard. If appropriate, this action could include the temporary relocation of affected residents until the hazard has been removed or mitigated.
3. Public water supplies and private wells in the area should be sampled immediately for radioactive materials and heavy metals.

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The enclosed Public Health Advisory expresses our concerns and addresses measures to eliminate human health hazards. The Assistant Administrator of ATSDR, Dr. Barry L. Johnson, has notified the EPA Region IX Administrator, the New Mexico State Department of Health, and the Indian Health Service about this Advisory.

Sincerely,

William L. Roper, M.D., M.P.H.
Administrator

Enclosure

cc:

EPA Administrator, Region IX
New Mexico State Department of Health
Indian Health Service
Indian Health Service, Navahoe Area Office
PHS Region VI
ATSDR Region VI
ATSDR Region IX

AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY
PUBLIC HEALTH ADVISORY

NAVAJO-BROWN VANDEVER
AND
NAVAJO-DESIDERIO URANIUM MINING AREAS
NAVAJO NATION
BLUEWATER, NEW MEXICO

November 21, 1990

Statement of Purpose

This Public Health Advisory is issued to inform the Environmental Protection Agency (EPA), the Navajo Nation, the Indian Health Service (IHS), the Bureau of Indian Affairs (BIA), the State of New Mexico, and the public of a potential significant environmental hazard to human health near Bluewater, New Mexico. After evaluating available information (1,2) and visiting the area, the Agency for Toxic Substances and Disease Registry (ATSDR) has determined that this Public Health Advisory is warranted for the Navajo-Brown Vandever (N-BV) and Navajo-Desiderio (N-D) Uranium Mining Areas. The presence of uranium-containing radioactive mine wastes, areas potentially contaminated with heavy metals, and many physical hazards form the basis of this Advisory. Because of these potential hazards to human health, the ATSDR is recommending that these sites be evaluated for inclusion on the National Priorities List.

At the request of the EPA, Region VI, and the Navajo Superfund Office (NSO), the ATSDR initiated preliminary investigations of the radiological, chemical, and physical hazards associated with the N-BV and N-D uranium mines. These sites are not currently on the National Priorities List, but the NSO and the EPA are currently developing Preliminary Site Assessments.

Two site visits by the ATSDR staff were made to the Navajo-Brown Vandever and Navajo-Desiderio Uranium Mining Areas. Field monitoring data were taken at the time of the visits. The ATSDR has concluded, based on the site visits, the data acquired during the visits, and the evaluation of other available information, that radioactive materials potentially hazardous to human health may be present at these sites. These hazardous materials include uranium-containing mine wastes with radiation levels potentially hazardous to human health, areas potentially contaminated with heavy metals at soil concentrations potentially hazardous to human health, and many physical hazards of public health concern. This finding has led to the issuance of this Public Health Advisory.

Background

The N-BV and N-D sites are in Bluewater, about 4 and 9 miles east of Prewitt, New Mexico, respectively (1,2). Both areas are in the Ambrosia Lake subdistrict of the Grants Uranium Mining District. Access to the areas is over improved dirt roads. These mining areas are in agricultural rural settings and adjacent to residential properties. Both mines are located on land owned by the Navajo Nation and held in trust by the Bureau of Indian Affairs, United States Department of Interior. The current owner of the N-BV mine is Mr. Brown Vandever, who lives at the site with his extended family. The owner of the N-D mine is Mrs. Jenny Desiderio, who inherited the mine from her deceased husband and lives on the site with her extended family.

The NSO estimates that at each site there are approximately 65 people, 30 of whom are children. Less than 3 miles from the sites is a preschool with a student enrollment of about 30 children. The NSO also estimates that about 500 persons are potentially impacted by environmental hazards at these sites.

A potable municipal-type water supply system for the area is derived from a well installed by the IHS. The NSO estimates depth of the well is about 1,100 feet. However, the NSO believes that not all residents are on this water system. The wells used by those residences not on the public supply are well systems operated by windmills.

The N-BV area encompasses about 155 acres (1), and the N-D mine covers about 130 acres (2). Within a mile of the N-BV mine is the Navajo-Nanabah Vandever (N-NV) mine site. These sites initially were open-pit mining operations. Besides the open-pit operations, the N-BV area operated as a subsurface mine. The site therefore includes horizontal mine shafts and ventilation shafts, some of which are almost vertical. During the site visits, the ATSDR observed that household wastes had been deposited into some of these shafts. It was apparent that local residents were still using these shafts for solid waste disposal.

Historically, the N-BV mine was operated periodically from 1952 to 1966 by various companies including Santa Fe Uranium, Federal Uranium Mesa Mining Company, and the Cibola Mining Company. During the operations of this mine, conventional mining techniques were used. The ore removed from the mine was believed to be sorted by hand and shipped to regional mills located near Ambrosia Lake or Shiprock, New Mexico, or the Durango, Colorado, areas. In its draft Preliminary Assessment of the site, the NSO documented that over 25,000 tons were removed from the mine. The ore processing produced about 49 tons of uranium oxide (U_3O_8) and over 37 tons of vanadium pentoxide (V_2O_5). Ores not meeting the screening criteria for uranium content were discarded at the mine site. These ores now line the roads leading to the Brown-Vandever residential and mine areas (1).

From 1952 to 1957, the N-D mine was operated by "Sante Fe" (exact name unknown, may not be the same company as previously mentioned) and the Hanosh Mines from Grants, New Mexico. The mining technique involved removing the soil overburden with heavy equipment followed by drilling and blasting the ores loose. The ores then were trucked to area mills for processing. Ores not meeting the minimum requirements for uranium content were disposed of at on-site locations. The NSO estimates that the 11,110 tons of ore removed by this operation contained over 83,000 pounds of U_3O_8 and over 17,500 pounds of V_2O_5 (2).

At both the N-BV and the N-D mines, the physical hazards are of particular concern to the ATSDR because of the number of children known to reside in the areas. The physical hazards observed by ATSDR include both open mine shafts and open pits. Because of the depth of the shafts and the unrestricted access, an inadvertent intruder either entering or falling into the shafts could be difficult to find and rescue.

Explanation of Terms

This document uses terms associated with radioactivity and dose resulting from radiation exposure. These terms are defined here.

curie -- A curie (abbreviated Ci) is the unit used to measure the amount of radioactivity. It is equal to the amount of radioactivity in 1 gram of radium (1 gram = 1/28 ounce or 0.0022046 lb). A picocurie (pCi) is one trillionth of a curie (1×10^{-12}). One trillionth is the same as 1 second in 320 centuries or 1 inch in 16 million miles. Exposure levels of the radioactive gas radon are commonly expressed as picocuries per liter of gas (pCi/L).

roentgen -- A roentgen (abbreviated R) is used to measure exposure to ionizing radiation, such as gamma rays or X-rays. Gamma radiation is energy given off by certain radioactive substances, such as uranium and radium. Basically, a roentgen defines the amount of energy given off by these radioactive substances into the air. An exposure of 1 R = 87.7 rads per 1 gram of air.

rad -- The abbreviation "rad" stands for radiation absorbed dose. It measures how much radiation is absorbed by a material after exposure to radiation. It is equal to 100 ergs of energy per gram of material (an erg measures energy).

rem -- The abbreviation "rem" stands for roentgen equivalent man. It is a function of the radiation absorbed dose (rad) and the type (or quality) of radiation. In terms of radiation quality, gamma rays are the least harmful internally to humans and alpha particles are the most harmful. The effect of 1 rem is approximately the same as that of 1 R of X-ray or gamma ray radiation. A millirem = 1/1-thousandth of a rem, the same as a dollar in \$1,000. A microrem = 1/1-millionth of a rem, the same as 1 minute in 2 years or 1 inch in 16 miles. Throughout the United States, the average natural radiation exposure (called "background levels") is nearly 300 millirems per year. This includes exposure to radon.

Background radiation occurs from natural sources in the earth's crust. Several naturally occurring radioactive materials contribute to this source of radiation. These include, but are not limited to, uranium, thorium, rubidium, and a small percentage of potassium. Other sources contributing to the background include fallout from cosmic radiation, materials made radioactive as a result of interactions with the cosmic radiation, and nuclear weapons testing. A measurement of the background radiation was collected at Prewitt, New Mexico, approximately 3 miles from these sites by the ATSDR and the NSO. Using radiation detectors sensitive to gamma radiation, the background radiation at Prewitt was estimated to be 6 microroentgens per hour (uR/h). This is equivalent to an annual exposure of 53 millirem, not including radon.

Basis for Advisory

During the week of July 24-27, 1990, and November 1, 1990, personnel from ATSDR Headquarters and Regions VI and IX offices toured these sites. Accompanying the ATSDR personnel were representatives of the local Navajo chapter and the NSO. During the visits, radiation readings were collected by both the ATSDR and the NSO. Discussions also were held with officials and members of the Navajo Nation concerning life-styles, populations, health concerns, and land use in these areas.

A. Navajo-Brown Vandever (N-BV) Site

Along the roadbed leading to the Navajo-Brown Vandever site, the area was littered with rocks and ore tailings. Mine tailings from the nearby Nanabah Vandever mine were within 100 feet from the roadbed. These piles were partially overgrown with vegetation. Within the materials along the roadbed, the uranium ores (yellowish material) were clearly visible. Environmental radiation readings along the road, obtained with a calibrated Ludlum Model 19 gamma radiation detector equipped with an NaI(Tl) scintillator, ranged from approximately 50 microroentgens per hour (uR/h) to over 500 uR/h, whereas the naturally occurring background radiation reading was 6 uR/h. The background radiation measurements were obtained in Prewitt, New Mexico, approximately 3 miles from the sites. Radiation monitoring evidence also suggested that radioactive material had migrated off-site because of both wind-borne distribution and surface runoff during seasonal rains. Additional radiation monitoring indicated that some residential structures contained radioactive material in the foundations and that radioactive materials were also present within 20 feet of the residential areas.

At the main mine shaft located in the pit-mined area, ore tailings were randomly piled around the site and radiation readings were elevated above background. A horizontal shaft entering the mountain was observed; and during discussions with local residents, it was mentioned that the shaft branches into three sections. Entrance to this mine shaft is not restricted. Vertical ventilation shafts were also observed; one shaft was about 10 degrees from vertical. A small shack was constructed over this

ventilation shaft, however, access to the shaft was not effectively restricted. Located near the residential areas were open adits (shafts) being used as solid waste disposal areas by the local residents. These adits may run at least 300 feet in length or depth. The residential areas are less than 200 feet from several adits, and access to these adits is also unrestricted.

Although air sampling data are lacking, because of the uranium content of these mines, the shafts provide an excellent path for the release of radon, a naturally occurring by-product of uranium decay. It is reasonable to infer that the release of radon from these mines could elevate ambient radon to levels potentially hazardous to human health at this site.

During mining operations, analysis of the ores indicated the presence of heavy metals. These included vanadium, arsenic, barium, chromium, magnesium, manganese, strontium, titanium, and zirconium. Leaching may have occurred from these ores; however, no analyses of environmental samples are available to verify the presence of these contaminants. Although recent sampling information is lacking, the potential exists for humans to be exposed to these contaminants through ingestion or inhalation.

B. Navajo-Desiderio (N-D) Site

The Navajo-Desiderio mine is a series of open-pit areas of approximately 30 to 50 feet in depth and of varying lengths. The radiation readings at this site were about 50 uR/h. No restricted access to the pits was observed during the site visit; children play and livestock graze freely in the area, and residential areas are within 100 yards of the pits.

Through a Navajo interpreter, the owner of the mine, Mrs. Jenny Desiderio, informed us that her grandson fell into one of the pits during a sledding accident. The child, who reportedly suffered brain damage, died a few years after the accident. According to Mrs. Desiderio, at least 18 livestock died after ingesting contaminated rainwater that reportedly collects in the pits. Whether the dead animals were examined by a veterinarian is not known. Although sampling data are lacking, the NSO officials believe the animals may have died after ingesting heavy metals which may have leached from the ores into the pit areas.

C. Discussion of Site-related Radiological Contaminants

Of the verified contaminants in these areas, those of concern are uranium and a member of its decay series, radon. Of the naturally occurring isotopes of uranium, uranium-238 (U-238) is the most abundant, present at concentrations greater than 99 percent. The primary mode of decay is via two alpha particles, each with a decay energy of approximately 4.2 million electron volts (MeV). The decay chain of which U-238 is the parent results in the production of both radium-226 and radon-222 and ultimately

terminates with stable lead-206. During this decay series, beta particles and gamma rays are produced as well as additional alpha particles, all at different decay energies (3). Because uranium is ubiquitous in nature, the daily human dietary intake is approximately 1.9 micrograms (4). Therefore, the body normally contains an estimated 90 micrograms of uranium. This corresponds to a body burden of about 30 picocuries. Of this amount, about 56 percent is associated with the skeleton; the remainder is in the soft tissues. The biological half-life is 100 days for whole body and 15 days for the kidneys (4).

After ingestion, the fractional uptake of uranium into the blood is 0.05 for water-soluble inorganic forms and 0.002 for water-insoluble forms (5). The critical organs for ingestion are the skeleton and kidneys. The lung surfaces are the critical organ after inhalation, although there is some solubilization of deposited uranium followed by absorption or ingestion (4).

Because Rn-222 is an inert gas, most of the inhaled gas is exhaled, with only that which decayed potentially remaining within the lungs. These radioactive materials deposited within the lung expose the bronchial epithelium lining the respiratory system, resulting in an elevated risk of lung cancer (5,6). Exposure to radon and radon progeny has been directly correlated with the appearance of lung cancer in humans. The first epidemiological studies of radon exposure were conducted in 1879, in Europe. Since then, such studies have been conducted worldwide and many are still in progress. The studies involve uranium miners and show increasing risks of lung carcinomas as accumulated exposure to these products increased (6).

Rn-222 decays by emitting an alpha particle with an energy of approximately 5.5 MeV and gamma rays with an energy of 0.51 MeV. The half-life of Rn-222 is 3.8 days (3). The decay products are also radioactive, emitting mostly beta particles and gamma rays with an alpha particle released during one decay step. These radon progeny, with half-lives ranging from seconds to over 20 years, ultimately decay to a stable (nonradioactive) form of lead.

The effects of biological exposure to radon are difficult to evaluate. Radon is inert and therefore does not attach to surfaces. However, the decay progeny are charged particles and can electrostatically attach to surfaces. Most progeny immediately attach to aerosols. The ratio of attached progeny to unattached progeny is important in dose calculations for as the ratio increases, the radiation dose to lung surfaces increases. Other factors affecting the lung dose include the ratio of Rn-222 to its progeny, the breathing patterns, lung characteristics, sex, and age of the individual exposed. In a recent report from the National Research Council (NRC), the dose from the radon progeny was of greater risk than exposure to radon gas (6). Dose estimates have been published by the National Council on Radiation Protection and Measurements (NCRP) (5). The NCRP estimates that the risk of developing lung cancer

Exposure to Rn-222 is 2.1×10^{-3} per pCi/L exposure under environmental conditions. The NCRP also states that the dose to the bronchial regions of a typical working adult because of exposure to Rn-222 is 0.27 rad per year per pCi/L. For a 10-year old child (12 hours active, 12 hours resting), the dose estimate is 0.45 rad/year per pCi/L.

D. Estimates of Radiation Exposure to Local Residents

Because detailed environmental monitoring for heavy metals and radioactive materials has not been supplied to the ATSDR, it is difficult to determine the health risks due to internal uptake of these materials. However, the external exposure to ionizing radiation can be evaluated using the on-scene monitoring results obtained by the ATSDR and the NSO. It is possible that the radiation exposures at these sites poses an imminent radiation health hazard to local residents. For the sites discussed in this Health Advisory, the ATSDR is defining an imminent radiation health hazard as exposures that exceed the regulations for radiation exposure to minors (as described in 10 CFR 20.104) and exposure to the public in areas of unrestricted access (10 CFR 20.105).

The Brown-Vandever mine site is in a residential area. In estimating the annual exposure to external ionizing radiation because of the contaminants in the area, the ATSDR used the following assumptions for a maximally exposed individual (MEI). The MEI would live on the site for 100 percent of the time (24 hours) and 365 days per year. The average exposure, including background in the area, is estimated conservatively to be approximately 125 uR/h. Assuming these values and the 24-hour exposure, the external radiation at this site could result in an individual receiving an external annual exposure of nearly 1 R, about 5 percent of which is from natural background as measured in the vicinity of the site (6 uR/h for 8,760 hours).

The risks of exposure to radiation have been investigated for nearly 100 years and the values have been extensively peer reviewed and accepted by the scientific community. In terms of risk estimates, the NCRP, in 1987, used a risk value for excess cancer mortality of 1×10^{-4} per rem per year for whole body exposure (7). In 1990, the NRC released the Biological Effects of Ionizing Radiation Report V, (BEIR V) (8). This report places the risk of excess cancer mortality as a result of continuous lifetime exposure to 0.1 rem per year at 320 for males and 600 for females per 100,000 population (Table 4-2, BEIR V report). Using the estimated population of 500 persons for this area, this would calculate to approximately three excess cancer deaths to residents as a result of exposure to the radiation over an estimated lifetime of 70 years. The American Cancer Society estimates that the expected rate of cancer deaths is on the order of 15 to 25 deaths for a population of 500 individuals.

Furthermore, because of the inherent production of radon released from the uranium-containing ores, the internal radiation dose, especially to the bronchial epithelium of the lungs, could be even higher. In a 1988 report, the NRC stated that the estimated dose to these tissues far exceeds any dose to organs from external natural background radiation (6). As an organ system, the allowable exposure limits for the lungs can exceed the whole body exposure dose limits (7). However, since no specific radon measurements have been made in this area, estimates of potential internal lung exposure to radon cannot be evaluated at this time.

Conclusions

The Agency for Toxic Substances and Disease Registry concludes that the Navajo-Brown Vandever and the Navajo-Desiderio Uranium Mining Areas may pose a potential significant hazard to human health for residents of these areas based on these premises:

1. The predictions of the external exposure model using the estimated exposures to ionizing radiation exceed the recommendations of the National Council on Radiation Protection and Measurements by a factor of 10. These recommendations state that the public exposure limit to continuous or frequent ionizing radiation should not exceed 0.1 rem per year (7), whereas, the estimated exposure to residents in the vicinity of the Brown Vandever mine could be on the order of 1 R (equivalent to 1 rem).
2. Possible human consumption of livestock potentially contaminated with heavy metals following the ingestion of standing water may pose a hazard to human health.
3. The many open mine areas, mine shafts, and the unrestricted access to these areas create a safety hazard.
4. Since evidence suggests that radioactive contaminants are migrating off-site and that heavy metals may be associated with the radioactive material, local food and livestock crops could be contaminated. This could result in a significant internal exposure to both radioactive materials and heavy metals if these crops are ingested.
5. It is apparent that not all local residents are supplied with public water. Because of the runoff and surface contamination around these sites, the water quality of the individual wells may be suspect and hazardous to humans chronically exposed to radioactive materials and heavy metals.

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RECOMMENDATIONS

The ATSDR proposes the following health actions to assist local residents:

1. The ATSDR, in coordination with the Navajo Tribal Council, the IHS, the BIA, the State of New Mexico, and other appropriate agencies, will conduct an environmental health education program to advise the public and medical community of the nature and possible consequences of exposure to ionizing radiation and heavy metal contaminants at the N-BV and N-D sites. Health education materials and assistance will be provided to local health care providers and other appropriate local public health officials.
2. The ATSDR will consider conducting health surveillance activities for populations at these sites.
3. The ATSDR will consider conducting a radiation or heavy metal exposure study of the local residents once additional health-related information on the local residents becomes available.

Because of the limited environmental sampling data available to both the ATSDR and the EPA, we recommend the following additional actions to protect the public health of area residents:

4. The responsible environmental regulatory agencies should within the calendar quarter, initiate data collection efforts to begin the characterization and determination of the extent of the radioactive contamination and possible presence of heavy metals. This sampling should include public water supplies and private wells in the area. Those wells exceeding standards should not be used for potable water and residents should be supplied with alternate potable water.
5. During this phase, personal radiation dosimeters and radon detection devices should be provided by the appropriate agencies to local residents to begin to estimate the external radiation exposure being received.
6. During these environmental studies and personal monitoring efforts, if the data being collected indicates that an imminent radiation health hazard exists to the area residents, then immediate steps, including consultation with the ATSDR, should be taken to mitigate that health hazard.
7. The mitigation or remediation would include, as appropriate, dissociation of local residents from the site until the direct public health hazard is removed. The remediation of the public health hazard should occur in the most expeditious manner consistent with Federal and State environmental protection, health, and radiation protection laws and regulations. Appropriate steps should be taken to protect public health during any removal actions (e.g., dust control, site access restrictions, and monitoring of radiation levels).

8. If these analyses indicate that the radiation exposures would result in a long term, chronic exposure, then applicable measures should be taken by the appropriate remedial regulatory agencies to remediate the public health hazard in the most expeditious manner and consistent with all applicable Federal, Tribal, and State guidelines and recommendations.
9. The appropriate agency should sample biota, food crops, and livestock to ascertain the potential for internal radiation exposure through consumption of contaminated food products and to identify addition potential sources of external exposure.
10. The appropriate responsible agency should take steps to prevent access to or otherwise make physically safe the various open mine areas, pits, and shafts.
11. Governmental agencies and any involved private sector organizations should work closely with Navajo representatives to ensure that cultural awareness and respect are observed and practiced.

For additional information, please contact the ATSDR at the following address:

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